

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

AL BEAMER, et al.)	CASE NO. C-1-02-013
)	
Plaintiffs,)	JUDGE SPIEGEL
)	
-vs-)	
)	
NETCO, INC., et al.)	<u>JOINT MOTION FOR EXTENSION OF</u>
)	<u>THE DISPOSITIVE MOTION DEADLINE</u>
)	<u>(CURRENTLY NOVEMBER 1, 2003)</u>
Defendants.)	
)	

Now comes parties, by and through counsel, and hereby moves this Court for an extension of the Court's current deadlines by thirty (30) days. The current deadlines are as follows:

- Discovery shall be completed on October 1, 2003;
- Dispositive Motions are due November 1, 2003
- A Final Pretrial is scheduled for February 26, 2004
- Trial on April 6, 2004

The parties are still engaged in discovery and continue to struggle with the scheduling of certain out of state depositions. After originally scheduling several depositions at the end of

August, they had to be cancelled due to an unforeseen conflict (Plaintiff's counsel's schedule) with Administrative hearings in the matter of *In re Chief Richard Wilk and the Village of Reminderville* which commenced on August 26th and was completed on September 7, 2003. Defense counsel subsequently was engaged in the preparation and participation in hearings before the National Labor Relations Board in Milwaukee for a period of two-weeks. The parties have identified the week of October 13th and October 20th as potential dates for the depositions that need to be completed. Though the parties are willing by agreement to continue doing discovery beyond the Court's deadline, the depositions will infringe upon the dispositive Motion deadline. Thus, the parties are jointly requesting an extension of the dispositive motion deadline of thirty- (30) days.

In the event that this extension prejudices the Courts review of these issues prior to the February 26, 2004 final pretrial, the parties would jointly consent to an extension of the final pretrial and/or trial date.

Respectfully submitted,



/per tele. consent 9-29-03

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CERTIFICATE OF SERVICE

A copy of the foregoing Unopposed Motion For Extension of Deadlines was sent by ordinary U.S. Mail, postage prepaid on this 30th day of September, 2003 to:

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